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PACIFIC  TELESIS
Group - Washington

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December 28, 1992

Donna R. Searcy
Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms Searcy:

Re: CC Docket No. 92-237 - *Administration of the North American Numbering Plan*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Comments" in the above proceeding.


Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Administration of the)
North American Numbering Plan)

CC Docket No. 92-237

COMMENTS OF PACIFIC TELESIS GROUP

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SUMMARY

Numbering resources are critical to all segments of the telecommunications industry. Number administration is composed of both planning and assignment. Careful planning in the use of these resources helps to forestall expensive exhaustion of numbers.

The Pacific Companies support keeping NANP administration at Bellcore with the addition of an Industry Advisory Council to develop policy and guidelines for number assignment. Bellcore will continue to operate NANP administration using the guidelines and policy developed by the Council.

To help develop policy, the Advisory Council will convene a numbering forum which will become the arena for numbering issues to be discussed by the industry. The entire industry should fund both the Council, the forum and NANP administration.

As to FGD CIC expansion, the Pacific Companies support the industry's decision to expand to 4 digits. Because of the expense involved, the Pacific Companies believe the Commission should allow exogenous treatment of these costs.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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COMMENTS OF PACIFIC TELESIS GROUP

In accordance with the Commission's Notice of Inquiry ("NOI"), released October 29, 1992, Pacific Telesis, PacTel Corporation, Pacific Bell, and Nevada Bell (the "Pacific Companies") file these comments concerning administration of the North American Numbering Plan ("NANP").

The administration of the NANP is an important function for the telecommunications industry. As competition increases, and the choices in telecommunications grow, numbering resources play a critical role. Numbers are essential for providing service. Administration of numbering resources requires diligent planning in order to forestall exhaustion of the resource, as well as a fair method of assigning numbers. In determining who should be NANP administrator the Commission should consider the responsibilities that the NANP administration must perform in order to accomplish these planning and assignment functions.

Responsibilities of NANP Administration

The NANP administration is the principal industry entity responsible for the planning and administration of World Zone 1 numbering resources. As the Commission recognized in its NOI, the NANP is the envy of the rest of the world.¹ It provides a uniform numbering scheme for 18 countries, more than a thousand local exchange carriers, several hundred long distance carriers, more than 1000 wireless licensees, and more than a hundred million end users.

NANP administration must have the capability to provide effective planning, management and leadership for the industry on numbering issues. NANP administration must monitor exhaust of numbering resources, make recommendations to forestall exhaust, and coordinate numbering with other long range telecommunications strategies (such as new product development).

Because the NANP administration administers numbers for all of World Zone 1, it must maintain relationships with Canadian and Caribbean carriers and authorities. Further, the NANP administration must maintain relationships with the FCC, domestic and international standards bodies, and other agencies, like the Department of State, for international matters.

In order for NANP administration to properly plan for future needs of the industry, industry input and oversight is desirable. Therefore, the NANP administration must be very

¹ NOI at para 23.

familiar with the use of numbering resources throughout the industry and must develop guidelines accordingly.

Of these various attributes of the NANP administration, the most important is planning. Numbers cannot be effectively assigned unless careful, thorough and comprehensive planning has been done. Numbers must be assigned in accordance with long term goals and plans. Without effective planning in the use, allocation and reclamation of numbers, the resource will prematurely exhaust, causing the industry and ratepayers to incur exorbitant costs as well as confusion to the dialing public. Moreover, NANP policies and practices must not favor any particular users; numbers are a national resource and do not belong to any industry group.

Number exhaust is a concern of all segments of the industry. Charges for the use of numbering resources and number administration should be borne by all users on an equitable basis.

Who Should Administer the NANP?

The Commission seeks comment on who should administer the NANP -- Bellcore, or some other administrator.² The Commission notes, however, that "the numbering plan has been administered over a long period of time with considerable skill and foresight".³

² NOI at para. 28.

³ NOI at para. 23.

The Pacific Companies agree with the Commission's assessment of the NANP administration and support keeping NANP administration within Bellcore. Bellcore has been providing the NANP administration function since divestiture. A similar group performed the function before divestiture as part of AT&T. Thus, the institutional knowledge, experience and expertise resides in this group. However, more than a body of knowledge and experience is present with the Bellcore group. The administrative and operational support systems (e.g., Routing Database System) which are necessary to perform the administration functions have been established and have proven to be effective.

Thus, the Pacific Companies support keeping NANP administration within Bellcore. However, because there is a perception within the industry that Bellcore does not represent all segments of the industry, the Pacific Companies support the formation of an industry Numbering Advisory Council.

Industry Advisory Council

In January 1992 the NANP administration issued a "Proposal for the Future of Numbering in World Zone 1" to begin planning for the industry's numbering needs to year 2025. In that proposal, the NANP administration recommended the formation of an advisory council. The Pacific Companies support that recommendation and believe that the concept can be expanded to address concerns of segments of the industry that NANP should be advised by a more representative group. This would allow for

more open and active participation by the entire telecommunications industry.

The Pacific Companies suggest that the Advisory Council be formed as soon as possible and be composed of a representative from the following industry groups: local exchange carriers, interexchange carriers, wireless carriers, competitive access providers, enhanced service providers, NARUC, and the FCC. Initially, these representatives can be chosen through respective trade associations of each industry. The Advisory Council will provide guidance to the NANP administration on policy issues, will plan for future use of numbering resources, and will fund NANP administration.

Once established, the Advisory Council should support and convene a numbering forum to address various numbering policy issues, and to assist with the planning function. The forum should be patterned after the consensus procedures used at the Industry Carriers Compatibility Forum ("ICCF"). Guidelines for assigning numbering resources should be developed through this forum. The Commission should ensure that issues currently being addressed in other forums are transferred quickly to the numbering forum in a way that causes as little disruption as possible to the work already accomplished.

The Council will serve to analyze issues brought to it by NANP administration and other industry participants, and make recommendations in a timely manner. It should not be involved in the day-to-day operations of NANP administration. The Council should make use of Bellcore's technical expertise to

assist it in planning for future numbering needs. The Council would also serve to resolve complaints which arise. The Council itself should also adopt rules to act on consensus. No party should have veto rights over a decision made by the majority of the Council. Final appeal authority should remain with the Commission.

The Advisory Council should not be able to have access to any sensitive proprietary data of any Bellcore client company, or any other company who submits such data to NANP administration in support of its numbering needs.

Alternative Dispute Resolution

The Commission seeks comment on whether alternative dispute resolution or negotiated rulemaking could be employed in situations where the industry is unable to reach consensus.⁴ Pacific believes that these techniques will probably not be useful in solving these sorts of problems.

Numbering issues normally arise, and are worked in industry forums, such as Industry Carriers Compatibility Forum ("ICCF"), and Information Industry Liaison Committee ("IILC"). These forums attempt to resolve the issue by consensus. In a way, these forums are using alternative dispute resolution techniques. After an issue cannot be resolved and it ends up at the Commission, it would be a waste of time and resources to repeat the process that led to the lack of consensus. Negotiated rulemaking is nothing more than putting key industry

⁴ NOI at para 31.

players in the same room, and seeing if they can come up with a solution to a problem. This is precisely what occurs at these forums, and what can also occur through the proposed Industry Advisory Council.

Arbitration or mediation may be more useful if a dispute is fact-based in nature (as opposed to policy-based or issue-based). When a dispute involves numbering policy, Pacific does not believe these techniques will be efficient. The Advisory Council will hopefully be able to resolve specific disputes which may arise. If not, though, Commission involvement, through the complaint process or some other proceeding, will probably be necessary.

Costs of NANP Administration

The Commission seeks comment on how the costs of NANP administration should be funded.⁵ The Pacific Companies believe that all industry participants should contribute to the costs of the NANP administration process, including funding of the advisory council.

Structural Separation

The Commission asks for comment on whether NANP administration should be structurally separate from the rest of Bellcore.⁶ Pacific does not believe this is necessary. If all segments of the industry have a voice on the Advisory Council,

⁵ NOI at para 33.

⁶ NOI at para 32.

and contribute to the NANP administration funding, concerns about bias should be adequately addressed without having to restructure the NANP administration.

PHASE II

The Commission seeks comments on the exhaust of Feature Group D CICs and what can be done to either forestall exhaust or resolve the issue differently from the planned expansion from 10XXX to 101XXXX.⁷

The industry has determined, in a ICCF workshop, that there are no technical alternatives. The Pacific Companies support the industry plan to expand CICs. There does not appear to be any way to forestall the exhaust. The current plan is to expand FGD CICs in the first half of 1995. This time-frame was determined by the NANP administration with consensus by the industry based on the available balance of CICs yet to be assigned and the rate of assignment of those CICs. Expansion of these codes is necessary to allow new entrants into the market.

The MFJ requires that access for carriers other than AT&T be provided:

through access codes containing the minimum number of digits necessary at the time access is sought to permit nationwide, multiple carrier designation for the number of interexchange carriers reasonably expected to require⁸ such designation in the immediate future.

⁷ NOI at para 38.

⁸ Modification of Final Judgment, Appendix B, Section A.2(i).

Therefore, not only must equal access be made available to other carriers, but such access must be allowed through the same number of digits as customers use to access AT&T. Thus, all current users of 10XXX must convert, and educate their customers, to use 101XXXX. The NANP has suggested an 18 month permissive dialing period, similar to the concept of having a permissive period in an area code split. This gives end users time to get used to the new dialing pattern. Pacific supports the 18 month permissive dialing period for the new FGD CIC.

Conversion to a 4-digit CIC involves upgrades to our switches and to billing and support systems. Due to software limitations some switches need to be replaced to accomplish the upgrade. Because the conversion date is relatively close, Pacific Bell and Nevada Bell have already expended a large portion of the necessary funds toward hardware and software purchases. Therefore, changing the way the industry will handle FGD CIC exhaust will not relieve many of the costs incurred by Pacific Bell and Nevada Bell.

Because expanding FGD CICs is very expensive (approximately \$84 million for Pacific Bell), the Pacific Companies support exogenous treatment of those costs. According to the Commission, "[e]xogenous costs are in general those costs that are triggered by administrative, legislative or judicial action beyond the control of the carriers."⁹ As the Commission

⁹ See Policy and Rules Concerning Rates for Dominant Carriers, 5 FCC Rcd 6876, 6807 (para. 166) (1990).

noted in footnote 49 of the NOI, its decision in First Data Resources, requiring Pacific to allow end users to purchase out of the access tariff, hastened the exhaust of these codes. Further, the MFJ requirement dictates that access codes be made available. Thus, judicial and regulatory requirements are directly responsible for the expenditure of these costs, and justify treating these costs exogenously.

Expanding the CIC brings limited benefit to Pacific Bell and Nevada Bell; rather it benefits the industry as a whole because it encourages competition by allowing new entrants into the market. While the Commission looked at this issue briefly in the price caps docket (Docket No. 87-313), it should reexamine this issue to authorize treatment of this significant expense as exogenous.

PCS Numbering

The Commission notes that the numbering schemes used for personal communications services ("PCS") are important and are the subject of domestic and international discussions. The Commission further notes that the issue is now being considered by the Standards Committee T1 - Telecommunications domestically, and at CCITT internationally. It seeks comments on what actions need to be taken to foster personal communications.¹⁰

Personal communications are comprised of a family of telecommunications services which are person specific rather than location specific. To the end-user personal communications

¹⁰ NOI at para 40.

should be easy to use services that are provided by seamless integrated network offering both wireline and wireless access modes. PCS are public switched network services and must interconnect with the public switched telephone network. The Pacific Companies believe that numbering for personal communications should be based on the 10-digit NANP. This is necessary so that new PCS services are logically integrated with existing service. The NANP resources have adequately served the numbering needs of the World Zone 1, and with proper planning will continue to serve the needs for all kinds of telecommunications services including personal communications, in the future.

Personal communications includes two types of mobility: terminal mobility and personal mobility. Terminal mobility signifies untethered terminals that can be used by any one having access to the terminals. Personal mobility allows calls to follow a person, based on his/her personal number, regardless of the user's type of terminal (wireline or wireless) and location. Personal mobility should be based on routing via embedded intelligence in the network. This utilizes our existing and future telecommunications infrastructure which is a valuable national asset. PCS use of the public switched telephone network also helps keep the network at the technological forefront of communications.

Terminal mobility is offered by wireless access (e.g., the currently available cellular, the future mass market low-power tetherless services, etc.) and are personal to the extent

that one needs to carry his/her wireless terminal. A call made to that terminal is still a terminal-to-terminal call, i.e., not a person-to-person call. Today the numbers are physically burned into the mobile terminals. If the user of a mobile terminal accidentally forgets to carry the terminal, the calls made to that terminal will still be routed to that terminal. These services are being offered using the currently available geographic location specific numbers, and have seen robust growth. Non-geographic numbers can also be used for such services. Such numbers support new services such as Calling Party Pays and result in more efficient routing of calls. Because geographic codes are tied to a specific location, calls are always routed back to a mobile customer's home geography, regardless of where the subscriber is located. Non-geographic codes combined with national databases would significantly decrease the interexchange expense of mobile calls for both the carriers and subscribers.

For personal mobility, the numbers identify the person. The numbers for personal mobility have to be non-geographic numbers. The owner of a personal number will have a service profile which will specify user data such as the types of calls to be completed, and how and where. For example, it will be possible to specify that while on a vacation one wishes to receive calls only from the supervisor, and only if the call is made between a certain period of the day. The person may also specify the type of wireline and/or wireless terminal that call may be routed to. Such non-geographic numbers are truly

personal numbers belonging to a person, and not assigned to a terminal or a particular network.

As the industry evolves toward true personal communications combining personal mobility, terminal mobility, and service profile management, there will be increasing demands on non-geographic code resources. Non-discriminatory assignment of these codes will be a critical policy issue which should be addressed by the Industry Advisory Council. The Council should also examine issues of a customer's ability to change service providers while keeping the same number. The Pacific Companies support the goal of number portability. Lessons learned from the 800-database experience should ease the work required for the personal number database.

Local Number Portability

The Commission seeks comment on the costs and feasibility of local number portability.¹¹ The Commission does not define what it means by that term. The Pacific Companies define local number portability as the ability to move a geographically-based telephone number from one service provider to another within a geographic area no larger than an NPA, without changing the telephone number. A database technology for routing the call will be necessary. Because this issue is unrelated to the NANP administration, and must be closely examined by state regulators, the Pacific Companies suggest that the Commission not address this issue in this docket.

¹¹ NOI at para 41.

Other Issues

Pacific supports the Commission's determination to not address certain numbering issues which are currently being worked by various industry forums. In particular interchangeable NPAs, which are set to go into effect in 1995, is one issue that it is too late for the Commission to address. The allocation of those interchangeable NPAs is being addressed by the NANP administrator in its Long Range Numbering Plan and is an issue which should be addressed by the Advisory Council.

Conclusion

The Commission should endorse Bellcore's role of administrator of the NANP. However, to satisfy perceived inequities in the system, the Pacific Companies support the formation of an Industry Advisory Council. The Council should guide the NANP administration on policy matters and should convene a numbering forum to develop industry consensus on various numbering issues. All number users should contribute to the costs of the Advisory Council and of number administration on an equitable basis.

The Pacific Companies support the Commission's determination not to address various numbering issues currently being addressed by the industry. However, the Pacific Companies

suggest that the Commission examine the issue of exogenous treatment of the costs of FGD expansion.

Respectfully submitted,

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